

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

X Chapter 11

DELPHI CORPORATION, *et al.*

Case No. 05-44481 (RDD)

Debtors.

Jointly Administered

DECLARATION OF ROCHONE RUFFIN  
IN OPPOSITION TO DELPHI'S MOTION FOR AUTHORITY TO REJECT  
COLLECTIVE BARGAINING AGREEMENTS UNDER 11 U.S.C. § 1113(c) AND  
MODIFY RETIREE WELFARE BENEFITS UNDER 11 U.S.C. § 1114(g)

I, Rochone Ruffin, declare and state as follows:

1. My name is Rochone Ruffin. I am the Shop Chairperson for Local 1111, IUE-CWA ("Local 1111" or "the Union"), in Anaheim, California, a position I have held since February, 2004. I have also held the following Union positions: Executive Board Member, and alternate delegate to the IUE-CWA Convention. I have been employed by Delphi since January 11, 1999 as a production worker.

2. The Delphi plant in Anaheim, CA opened in 1954 as Delco-Remy ("Delphi Anaheim") making automotive batteries. In 1994 the plant was at its largest with over 400 bargaining unit workers. In 1999 it became Delphi. In 2004, there were over 100 workers laid off. In 2005, Delphi sold its battery business to Johnson Controls, Inc. ("JCI") and began winding down the Delphi Anaheim plant. In April, 2005, the remaining employees were moved to Ontario, California in to a supplier warehouse. The facility was completely closed in November, 2005 when employees received a letter telling them that they should no longer report to the warehouse. A copy is attached as Exhibit A. In the beginning of 2005, there were about 188 bargaining unit workers; there were 25 skilled trades workers, 10 indirect labor, 4 bargaining unit members doing nontraditional bargaining unit work, the rest were production workers. There are now 94 employees who are all in the Jobs Bank.

3. In 1994, Local 1111 negotiated the first competitive agreement which had supplemental employees who turned in to traditional employees in eight yearly steps. A copy is attached as Exhibit B. They were called "8 Step Employees". They were hired at a wage rate that was 55% of the top rate and received health benefits. They had a hire date but not a seniority date. They got a seniority date when workforce reached a

ratio of 80% traditional employees to 20% 8 Step Employees. There were also retirement incentives, and buyouts.

4. In 1998, Local 1111 entered into an agreement with General Motors that called for the hiring of new employees called the Build for Tomorrow Agreement. A copy is attached as Exhibit C. New hires came in at 52.5% of the traditional wage, with a seniority date, health care they paid for and no steps to parity for production workers. There was also an agreement made for competitive skilled trades workers hired at 52.5% of the traditional wage but they had 10 steps to parity for wages only, not benefits. The health benefits provided were choices of different HMO's at different costs. There was no vision coverage and reduced dental coverage.

5. In the 2001 agreement, there were no competitive changes. There were buyouts and retirement incentives offered. The contract negotiated in 2003 was a four-year agreement. There were no competitive changes. There were also buyouts and retirement incentives offered.

6. There were also buyouts and retirement incentives offered which were taken by 45 employees in 1999, by 5 employees in 2000 and by 15 employees in 2001. In 2004-05 about 100 employees left with a buyout or incentive retirement.

7. The Union agreed to shrink the membership and give away jobs so that Delphi could be more competitive. For example, the Company took out the tool crib. The work was outsourced but it ended up costing the Company more.

8. All of the concessions by the Union were made to make the Company more competitive. In 2003, the Company promised to find a viable product replacement for Delphi Anaheim. They have not fulfilled this promise while we have kept our part of

the bargain. We have worked for less in exchange for promises of job security. Now the Company wants to eliminate the Jobs Bank which we have paid for by the many concessions we have made. We will be left with no way to support our families.

Dated: April 21, 2006

  
ROCHONE RUFFIN